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Whitefish Frontiers, LLC; Valley Oak, LLC; Casey's Management, LLC;
Two Bear Security, LLC; Two Bear Air 1, LLC; Crystal Slopeside, LLC; and
Two Bear Air Rescue Foundation*

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

MATTHEW MARSHALL; JOHN MAGUIRE;
KEEGAN BONNET; and ANTHONY
AGUILAR, Individuals,

Plaintiff[s],

v.

MICHAEL L. GOGUEN, an individual;
The Trustee of the MICHAEL L.
GOGUEN TRUST, a California Trust;
WHITEFISH FRONTIERS, L.L.C., a
Delaware limited liability company;
VALLEY OAK, LLC, a Delaware limited
liability company; PROOF RESEARCH,
INC., a Delaware corporation; CASEY'S
MANAGEMENT, LLC; TWO BEAR
SECURITY, LLC; TWO BEAR AIR 1,
LLC; CRYSTAL SLOPESIDE, LLC; TWO
BEAR AIR RESCUE FOUNDATION, a
Delaware non-profit corporation;
KAREN VALLADAO, an individual;
FRANK, RIMERMAN + CO. LLP,
believed to be a California limited
liability partnership; SHANE ERICKSON,
an individual,

Defendants.

CV-21-19-M-DWM

**GOGUEN DEFENDANTS' MOTION TO
DISMISS THE COMPLAINT FOR
FAILURE TO STATE A CLAIM UPON
WHICH RELIEF CAN BE GRANTED**

Defendants Michael L. Goguen; the Michael L. Goguen Trust; Whitefish
Frontiers, LLC; Valley Oak, LLC; Casey's Management, LLC; Two Bear Security,
LLC; Two Bear Air 1, LLC; Crystal Slopeside, LLC; and Two Bear Air Rescue
Foundation, by and through their counsel of record, hereby move to dismiss the

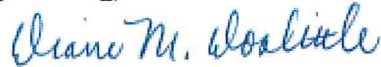
Plaintiffs' Complaint on the grounds that it fails to state a claim for which relief can be granted under Rule 12(b)(6).

Plaintiffs were contacted regarding this motion, which they oppose. A brief in support of this motion is filed herewith.

Date: June 30, 2021

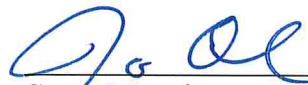
Attorneys for Defendants Michael L. Goguen; the Michael L. Goguen Trust; Whitefish Frontiers, LLC; Valley Oak, LLC; Casey's Management, LLC; Two Bear Security, LLC; Two Bear Air 1, LLC; Crystal Slopeside, LLC; and Two Bear Air Rescue Foundation

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CERTIFICATE OF SERVICE

I certify that on the 30th day of June 2021, I served a copy of the preceding document via CM/ECF on:

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